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FEDERAL COMMUNICATIONS COMMISSION  
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September 3, 1996

BY MESSENGER

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Revision of the Commission's Rules to Ensure  
Compatibility with Enhanced 911 Emergency  
Calling Systems, CC Docket No. 94-102

Dear Mr. Caton:

Pursuant to Section 1.429 of the Commission's rules,  
47 C.F.R. §1.429, enclosed please find a signed original and  
11 copies of Nokia Telecommunications, Inc.'s Petition for  
Reconsideration in the above-referenced proceeding. Also  
enclosed please find one copy to be date stamped and returned by  
the courier. Should you have any questions regarding this  
filing, please call the undersigned at the above number.

Sincerely,

  
Leo Fitzsimon

Enclosures

cc: John A. Malloy, Esq.

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS  
COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Revision of the Commission's Rules ) CC Docket No. 94-102  
To Ensure Compatibility with ) RM-8143  
Enhanced 911 Emergency Calling Systems )

**PETITION FOR RECONSIDERATION**

Pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429, Nokia Telecommunications, Inc. ("Nokia"), by its attorneys, hereby respectfully seeks partial reconsideration of the Federal Communications Commission's First Report and Order ("First R & O") adopted June 12, 1996 in the above-captioned proceeding.<sup>1</sup>

Nokia is an international manufacturer of telecommunications equipment specializing in wireless infrastructure and handset equipment. As a major manufacturer of wireless equipment, Nokia has a significant interest in the outcome of this proceeding. Nokia shares the Commission's belief that this is an important proceeding which will benefit the public interest by improving the quality and reliability of 911 services available to the customers of wireless telecommunications service providers. There are, however, several points on which Nokia seeks reconsideration by the Commission.

As an initial matter, Nokia notes that the term "code identification" used in the First R & O is based on cellular

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<sup>1</sup> First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 94-102, FCC 96-264 (Rel. July 26, 1996) ("First R & O" or "Further Notice").

systems using a mobile identification number ("MIN"). Nokia assumes that this definition will be broadened to include International Mobile Subscriber Identity ("IMSI"), the standard identifier used by PCS1900 systems. The following is based on this assumption:

First, the First R & O requires that, not later than twelve months after the rules in this proceeding become effective, all E911 calls containing code identification be routed to the appropriate Public Safety Answering Points ("PSAPs"), without going through the validation process.<sup>2</sup> Nokia believes that this requirement, without modification, will inhibit the effectiveness and reliability of 911 service. This requirement will prevent certain wireless system operators, including those employing PCS1900, from ascertaining sufficient information about a caller to obtain a callback number in the event that the 911 call is inadvertently terminated.<sup>3</sup> The inability to obtain a callback number may hinder the ability of a 911 operator to guide emergency service personnel to the location of a caller. Such an outcome would be contrary to the Commission's goal of ensuring that wireless telecommunications users have reliable access to 911 services.

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<sup>2</sup> First R & O at ¶ 29.

<sup>3</sup> Because the covered carrier is only required to forward 911 calls from mobile units that transmit using an air interface protocol compatible with that used by the covered carrier's system, First R & O at ¶ 33, the validation process would cause little delay in the processing of the 911 call.

In PCS1900 systems, the IMSI is mapped to the Mobile Station Integrated Services Digital Network (MSISDN) number during the validation process. This number is the telephone directory number. PCS1900 systems also allow a mobile terminal to identify itself with an International Mobile Equipment Identifier (IMEI). However, the IMEI is used for equipment validation purposes only, and cannot be used to address the mobile subscriber. The presence of the IMEI alone does not allow for enhanced emergency services.

Thus, without a user validation or other database verification, the absence of the Subscriber Identity Module (SIM) card, which contains the IMSI, precludes the possibility of supplying a callback number. From a public service standpoint, Nokia believes it is essential to allow the operator to make a database inquiry in order to gain the most information possible about a caller, including the callback number in the event that a 911 call is terminated.

Second, the First R & O requires covered carriers to provide, with 67 percent reliability, the location of the E911 wireless subscriber in terms of the latitude and longitude within a radius of 125 meters, within five years of the effective date of the rules.<sup>4</sup> While the industry is working on new technologies to accomplish this goal, it is still too soon to determine the accuracy that will be possible in various environmental conditions and under differing technologies. Nokia believes that this

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<sup>4</sup> First R & O at ¶ 71.

requirement should be removed from the rules adopted in this proceeding and reconsidered at a later time when the industry trials have progressed further and a decision can be made based on actual field trials and technological developments in this area.

For the foregoing reasons, Nokia requests that the Commission grant its Petition for Reconsideration.

Respectfully submitted,

**NOKIA TELECOMMUNICATIONS, INC.**

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September 2, 1996